

# Exhibit E

## PLAINTIFFS [PROPOSED] VERDICT FORM

### PLAINTIFF BENETRIA McGOWAN'S CLAIMS

1. On August 30, 2016, did Defendant Rebecca Wallich order Plaintiff Benetria McGowan to disperse and arrest her, in the absence of an immediate clear and present danger of riot, serious bodily injury or other imminent lawlessness that rose far above inconvenience, annoyance or unrest, in violation of her First Amendment rights?

\_\_\_\_\_ YES

\_\_\_\_\_ NO

2. On August 30, 2016, did Defendant Nesrodene Ghassoul order Plaintiff Benetria McGowan to disperse and arrest her, in the absence of an immediate clear and present danger of riot, serious bodily injury or other imminent lawlessness that rose far above inconvenience, annoyance or unrest, in violation of her First Amendment rights?

\_\_\_\_\_ YES

\_\_\_\_\_ NO

3. If you answered YES to questions 1 or 2 or both, do you find that Defendant James Harpole's actions in directing police operations in the Sherman Park neighborhood on August 30, 2016, make him liable for the violation of Plaintiff Benetria McGowan's First Amendment rights?

\_\_\_\_\_ YES

\_\_\_\_\_ NO

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4. If you answered YES to questions 1 or 2 or both, do you find that Defendant City of Milwaukee's policy, reflected in the orders or statements of then-Chief Edward Flynn or Defendant James Harpole, makes the City of Milwaukee liable for the violation of Plaintiff Benetria McGowan's First Amendment rights?

\_\_\_\_\_ YES

\_\_\_\_\_ NO

5. Did Defendant Rebecca Wallich arrest Plaintiff Benetria McGowan without probable cause to believe she was obstructing an officer in violation of her Fourth Amendment rights?

\_\_\_\_\_ YES

\_\_\_\_\_ NO

6. Did Defendant Nesrodene Ghassoul arrest Plaintiff Benetria McGowan without probable cause to believe she was obstructing an officer in violation of her Fourth Amendment rights?

\_\_\_\_\_ YES

\_\_\_\_\_ NO

7. If you answered YES to questions 5 or 6 or both, do you find that Defendant James Harpole's actions in directing police operations in the Sherman Park neighborhood on August 30, 2016, make him liable for the violation of Plaintiff Benetria McGowan's Fourth Amendment right to be free from an unlawful arrest?

\_\_\_\_\_ YES

\_\_\_\_\_ NO

8. If you answered YES to questions 5 or 6 or both, do you find that Defendant City of Milwaukee's policy, reflected in the orders or statements of then-Chief Edward Flynn or Defendant James Harpole, makes the City of Milwaukee liable for the violation of Plaintiff Benetria McGowan's Fourth Amendment right to be free from an unlawful arrest?

\_\_\_\_\_ YES

\_\_\_\_\_ NO

9. Did Defendant Rebecca Wallich use excessive force at any time against Plaintiff Benetria McGowan in violation of her Fourth Amendment rights?

\_\_\_\_\_ YES

\_\_\_\_\_ NO

10. Did Defendant Nesrodene Ghassoul use excessive force at any time against Plaintiff Benetria McGowan in violation of her Fourth Amendment rights?

\_\_\_\_\_ YES

\_\_\_\_\_ NO

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11. If you answered YES to any of the above questions 1-10, answer the following questions:
- a. What amount, if any, do you award to plaintiff Benetria McGowan as compensatory damages as a result of the violation of her constitutional rights?
- Answer in DOLLARS: \$ \_\_\_\_\_
- b. Did the Defendants act willfully, deliberately, maliciously, or with reckless disregard of Plaintiff Benetria McGowan's constitutional rights?
- \_\_\_\_\_ YES      \_\_\_\_\_ NO
- c. If you answered YES to 11.b., you must award punitive damages. What amount of punitive damages is appropriate?
- Answer in DOLLARS: \$ \_\_\_\_\_

### PLAINTIFF JARRETT ENGLISH'S CLAIMS

12. On August 30, 2016, did Defendant Raymond Brock order Plaintiff Jarrett English to disperse and arrest him, in the absence of an immediate clear and present danger of riot, serious bodily injury or other imminent lawlessness that rose far above inconvenience, annoyance or unrest, in violation of his First Amendment rights?
- \_\_\_\_\_ YES      \_\_\_\_\_ NO
13. On August 30, 2016, did Defendant Nesrodene Ghassoul order Plaintiff Jarrett English to disperse and arrest him, in the absence of an immediate clear and present danger of riot, serious bodily injury or other imminent lawlessness that rose far above inconvenience, annoyance or unrest, in violation of his First Amendment rights?
- \_\_\_\_\_ YES      \_\_\_\_\_ NO
14. On August 30, 2016, did Defendant Andrew Wilkiewicz order Plaintiff Jarrett English to disperse and arrest him, in the absence of an immediate clear and present danger of riot, serious bodily injury or other imminent lawlessness that rose far above inconvenience, annoyance or unrest, in violation of his First Amendment rights?
- \_\_\_\_\_ YES      \_\_\_\_\_ NO

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15. If you answered YES to questions 12, 13 or 14 (or any combination of those questions) do you find that Defendant James Harpole's actions in directing police operations in the Sherman Park neighborhood on August 30, 2016, make him liable for the violation of Plaintiff Jarrett English's First Amendment rights?
- \_\_\_\_\_ YES \_\_\_\_\_ NO
16. If you answered YES to questions 12, 13 or 14 (or any combination of those questions), do you find that Defendant City of Milwaukee's policy, reflected in the orders or statements of then-Chief Edward Flynn or Defendant James Harpole, makes the City of Milwaukee liable for the violation of Plaintiff Jarrett English's First Amendment rights?
- \_\_\_\_\_ YES \_\_\_\_\_ NO
17. Did Defendant Raymond Brock arrest Plaintiff Jarrett English without probable cause to believe he was obstructing an officer in violation of his Fourth Amendment rights?
- \_\_\_\_\_ YES \_\_\_\_\_ NO
18. Did Defendant Nesrodene Ghassoul arrest Plaintiff Jarrett English without probable cause to believe he was obstructing an officer in violation of his Fourth Amendment rights?
- \_\_\_\_\_ YES \_\_\_\_\_ NO
19. Did Defendant Andrew Wilkiewicz arrest Plaintiff Jarrett English without probable cause to believe he was obstructing an officer in violation of his Fourth Amendment rights?
- \_\_\_\_\_ YES \_\_\_\_\_ NO
20. If you answered YES to questions 17, 18 or 19 (or any combination of those questions), do you find that Defendant James Harpole's actions in directing police operations in the Sherman Park neighborhood on August 30, 2016, make him liable for the violation of Plaintiff Jarrett English's Fourth Amendment right to be free from an unlawful arrest?
- \_\_\_\_\_ YES \_\_\_\_\_ NO

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21. If you answered YES to questions 17, 18 or 19 (or any combination of those questions), do you find that Defendant City of Milwaukee's policy, reflected in the orders or statements of then-Chief Edward Flynn or Defendant James Harpole, makes the City of Milwaukee liable for the violation of Plaintiff Jarrett English's Fourth Amendment right to be free from an unlawful arrest?

\_\_\_\_\_ YES \_\_\_\_\_ NO

22. Did Defendant Raymond Brock use excessive force at any time against Plaintiff Jarrett English in violation of his Fourth Amendment rights?

\_\_\_\_\_ YES \_\_\_\_\_ NO

23. Did Defendant Nesrodene Ghassoul use excessive force at any time against Plaintiff Jarrett English in violation of his Fourth Amendment rights?

\_\_\_\_\_ YES \_\_\_\_\_ NO

24. Did Defendant Andrew Wilkeiwicz use excessive force at any time against Plaintiff Jarrett English in violation of his Fourth Amendment rights?

\_\_\_\_\_ YES \_\_\_\_\_ NO

25. If you answered YES to any of the above questions 12-24, answer the following questions:

- a. What amount, if any, do you award to plaintiff Jarrett English as compensatory damages as a result of the violation of his constitutional rights?

Answer in DOLLARS: \$ \_\_\_\_\_

- b. Did the Defendants act willfully, deliberately, maliciously, or with reckless disregard of Plaintiff Jarrett English's constitutional rights?

\_\_\_\_\_ YES \_\_\_\_\_ NO

- c. If you answered YES to question 25.b., you must award punitive damages. What amount of punitive damages is appropriate?

Answer in DOLLARS: \$ \_\_\_\_\_

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\_\_\_\_\_  
Date

\_\_\_\_\_  
Foreperson